

mm 5690

December 22, 2005

Ms. Alva Dar Jarnett Miller

Paralegal

Federal Election Commission

Office of the General Counsel

999 E. Street NW

Washington, DC 20463



Dear Ms. Miller:

As per letter received from Mr. Jeff S. Jordan, Supervisory Attorney, Complaints Examinations & Legal administration, I am taking the opportunity provided to respond to issued complaint MUR 5690 with regards that this response will remain confidential in accordance with 2 U.S.C \$437g(a)(4)(B) and \$437g(a)(12)(A).

Prior to addressing the issues presented in the complaint, I would like to explain the overall operation of the Jim Gerlach for Congress Committee regarding the receipt and input of contributions data. Pursuant to the Finance Director's Campaign Service Agreement (Exhibit 1), the receipt, inputting and monitoring of contribution data was part of the Finance Director's responsibilities.

The campaign software company utilized as the depository of contribution and disbursement data and the filing of required FEC reports was Complete Campaigns.Com, located at 610 Gateway Center Suite K San Diego, CA. 92102.

The following is my response to complaint issues.

I. Gerlach failed to disclose the names of contributors who made donations through a joint fundraising committee in violation of 2 U.S.C.§434(b)(3).

In response to statement made that I asked, "Is there anything else that we need to do for this", I believe that statement was misinterpreted. What the statement connotates was "Is there any additional information required, please do not hesitate to contact me." Also within the same response #2, I stated that the joint fundraising receipts entries were made into our Complete Campaigns. Com database by our Finance Director based on instructions received from Complete Campaigns. Com regarding input on individual contribution listing.

Referencing Exhibits 2,3,4, and 5, whereby, upon receipt of letter from Ms. Robin Kelly, Campaign Finance Analyst, dated June 16, 2005 highlighting fact that the itemized individual contributions did not appear on the April Quarterly report, I sent a letter to Mr. Ben Katz of complete campaigns. Com regarding this issue and received response via e-mail from Zsmith, support staff at Complete Campaigns, stating in 2nd paragraph that computer error was detected and was corrected with no need to worry about it. When amendments were filed via Complete Campaigns. Com the computer error was not corrected as they indicated to us thus causing the continued failure to list the itemized contributors.

II. Gerlach failed to accurately disclose the total amount of contributions received during the 2005-2006 election cycle in violation of 2 U.S.C. \$434(b)(2) by reporting receipts of \$3.3 million when it appears that only \$1.1 million was actually raised.

In response to this item, please refer to Exhibits 6 and 7 reflecting correction have now been made. With the inception of a new election cycle, Complete Campaigns. Com computer database form "Change FEC Starting Information" (Exhibit 6) needed to be changed. Also the General election Date and Election Date fields in the Complete Campaigns. Com form "Generate FEC Form 3" (Exhibit 7) needed to be changed to the 2006 dates. Due to clerical error, the starting information was not changed in the computer database and the typing in of the incorrect date of 2004 caused the receipts of the 2004 campaign cycle to be included and carried over into the 2006 cycle.

III. Gerlach failed to maintain an accurate account of small contributions and failed to accurately disclose the total amount of contributions received from donors in violation of 2 U.S.C. £434(b) and (c).

Clerical error input of refunds issued was inadvertently inputted as contributions rather than an expense causing the (\$8911.21) amount to appear as a negative unitemized contribution.

IV. Gerlach apparently fails to accurately disclose the total amount of contributions received during the Third quarter of 2005 in violation of 2 U.S.C. \$434(b)(2).

Response same as Item III above.

V. Gerlach fails to accurately report the cash on hand amount in violation of 2 U.S.C. \$434(b).

Response same as Item III above. The amended reports filed on 9/23/05 reflected current COH balances based on the corrected Year End Report filed on 9/13/05.

VI. Gerlach failed to disclose all or some contributions made by individuals in violation of 2 U.S.C. \$434(b)(3).

Reference Exhibits 8, 9, 10, 11, 12, and 13.

- 1. Beth Myers Exhibit 8 clearly reflects contribution of \$2,000 on 11/18/04. Exhibit 9 illustrates the transaction in detail
- 2. Ross Myers Exhibit 10 clearly reflects contribution of \$2,000 on 11/18/04. Exhibit 11 illustrates the transaction in detail.
- 3. Robert Sataloff Exhibit 12 clearly reflects contribution of \$ 500 on 11/2/04. Exhibit 13 illustrates the transaction in detail. This transaction was recorded for the 2004 cycle.

The above transactions were properly inputted into Complete Campaigns. Com database. Computer transmission error was responsible for not being itemized in previous reports.

VII. Gerlach accepted contributions from persons in excess of \$2,100 per election in violation of 2 U.S.C. \$441a(a)(1)(A).

Check from friends of John Perzel in the amount of \$4,000 was accepted in error and inputted into Complete Campaigns .Com database.(Exhibit 14). Upon receipt of check, Finance Director was to issue letter to sender explaining contribution limitation with option of returning original check or asking for documentation to support splitting amount to both Primary and General election. This did not occur; therefore, refund check will need to be issued with correct database entry being made to resolve this error.

VIII. Gerlach apparently accepted a prohibited contribution from a corporation in violation of 2 U.S.C.\$441b.

Original contribution by Warner Road Associates was correctly accepted and inputted into database by Finance Director as a partnership indicating that Mr. Richard Ireland was a partner. (Exhibit 15). Complete Campaigns lists only primary occupation and employer in its "Individual" database. (Exhibit 16) To that end, I believe contribution received and recorded was properly done.

IX. Gerlach fails to accurately state the purpose of disbursements resulting in confusing and inaccurate reports in violation of 11 C.F.R. §104.3(b)(3)(i).

The issuance of disbursement checks to the United States Treasury- Internal Revenue Service was a directive received by the IRS pertaining to fundraiser consultant – Eleanor Martin Cadden whereby all fees earned by Mrs. Cadden inclusive of retainer and commission, were to be issued to the IRS with checks made out to the United States Treasurer – Internal Revenue. See exhibits 17 and 18. Original directive is filed with campaign office. Please contact the IRS office in Cherry Hill, NJ to validate issuance of directive.

X. Gerlach discloses limited payments for administrative expenses such as state employment taxes may result in violations of Federal and state tax law.

Individuals listed in number 55 of complaint are independent contractors and are issued Form 1099 – Misc for individual reporting of taxes. Exhibits 19 and 20 reflect copies of form 1099 issued for fees earned in 2004 for both E. Allen and A. Randzin. Forms 1099 will be issued by required date in early 2006 for fees earned by E. Allen, A. Randzin, and E. Reinholt in 2005.

Conclusion

In addressing the complaint issued I have concluded that many of the errors mentioned were part human error and part computer error in regards to the transformation of data. No error was intentionally committed to misrepresent the Jim Gerlach for Congress Committee but one of being an honest mistake. To that end, pursuant to my resignation as Treasurer, I have been in contact with new Treasurer, Mike DeHaven regarding the issues raised in this complaint. He is in the process of preparing proper amendments to correct the noted discrepancies.

Sincerely,

Alan J. Randzin

Alan Landzin



Campaign Service Agreement

Eve Allen,

Kennett Square, PA 19248

Date: January 1, 2005

Name/Title: Congressman Jim Gerlach

Organization: Jim Gerlach for Congress Committee

Address: P.O. Box 87, Uwchland, PA 19480

Telephone: 610-458-7374

Fax: 610-458-7826

- 1. The Jim Gerlach for Congress Committee requests the following campaign services from Eve Allen: Serve as Finance Director for the campaign committee. Duties include, but not limited to: Direct fundraising for the committee, monitoring profession fundraisers, budgeting, inputting contributions, tracking fundraising productivity, providing timely reports, event planning, volunteer supervision as it pertains to fundraising, writing fundraising correspondence, coordinating Finance Committee activities, maintaining current fundraising data base and campaign office management.
- 2. Agreed upon monthly fee of \$4,170, plus: in district travel necessary for fundraising activities @ \$.31 a mile.

Payment is due on: 1st of each month.

3. This agreement will last through December 31st, 2005. Either party may terminate this agreement early with two weeks written notice.

	A	•					
			service agreem	ent between	Congressman	Jim Gerlach	and
Eve Alle	n. Please	sign and da	ate below.		,	<i>f</i>	
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Eve Allen:

Date:

Signature:

Date:



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

RQ-2

June 16, 2005

Alan Randzin, Treasurer Jim Gerlach for Congress Committee 911 Welsh Ayres Way Downingtown, PA 19335

Response Due Date: July 17, 2005

Identification Number: C00372102

Reference:

April Quarterly Report (1/1/05-3/31/05)

Dear Mr. Randzin:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Schedule B of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, you must itemize, as a memo entry, the name and address of the original vendor, together with the date, amount and purpose of the expenditure. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR §104.9)

-For future reports, please be advised that contributions from individuals and political committees should be itemized on a separate Schedule A. Additionally, the total amount of these contributions should be reported on the appropriate line of the Detailed Summary Page information - (11(a), 11(b) and 11(c)). (2 U.S.C. §434)

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure,

Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1170.

Sincerely,

Robin Kelly

Campaign Finance Analyst Reports Analysis Division



EXHIBIT 3

U.S. Congress

P.O. Box 87 • Uwchland, PA 19480-0087 • Phone: 610-458-7374 • Fax: 610-458-7826

July 6, 2005

Ben Katz Complete Campaigns.com 610 Gateway center Way Suite K San Diego, CA. 92102-4548

Dear Ben:

I received the attached letter from Robin Kelly, Campaign Finance Analyst Reports Analysis Division FEC which highlights that all future reports that all individual and political committees contributions be itemized on a separate Schedule A with total amount being reported on the appropriate line of the Detailed Summary Page. I would appreciate your input in correcting this notation for all our future reports. To that end, please provide me a response so that I can properly respond to Ms. Kelly that we have addressed this concern

Please forward your response to me. Thank you.

Alan J. Randzin

Treasurer - Jim Gerlach for Congress Committee





EXHIBIT 4

Subj Date From

To

RE: FEC April Quarterly Report 1/1/2005-3/31/2005 7/8/2005 6 08 05 PM Eastern Standard Time

zsmith@completecampaigns com

Hey Alan,

The 11 CFR 104 9 Error on the Schedule B report was generated in the FEC filing because you did not list sub vendors for your VISA expenses. You need to list sub vendors on VISA transactions

The 2 USC 434 Error was being generated because various committees at some point were filed as individuals. It looks like this has already been corrected in your database however so you don't need to worry about it.

If there is anything else you need feel free to give us a call

Zach Smith support@CompleteCampaigns.com
W: 888-217-9600
F: 619-527-8719
www.CompleteCampaigns.com

Saturday, July 09. 2005 America Online: Arandzin



BHIBIT 5

U.S. Congress

P.O. Box 87 • Uwchland, PA 19480-0087 • Phone: 610-458-7374 • Fax: 610-458-7826

FILE GOPY

July 13, 2005

Robin Kelly Campaign Finance Analyst Reports Analysis Division Federal Election Commission 999 E. Street, N.W. Washington, DC 20463

Dear Robin:

In response to your letter dated June 16, 2005 regarding Schedule B as to disbursements to credit card companies, and itemization on Schedule A, please note the following actions taken:

- 1) Have properly corrected all credit card payments reflecting the required itemizations needed for both Year-end Report and April Quarterly report. Filed amendments to reflect corrections made.
- 2) As to itemization for Schedule A, please refer to attached e-mail received from Complete Campaigns addressing the issue and resolvement. Again, as they stated amendments just initiated will correct this issue.
- 3) Based on our recent conversation related to the Joint Candidate Committee receipts received on 12/20/04, I contacted Complete Campaigns and they informed me to provide info within their memo field of which I completed and included in amendment completed (enclosed copy of fax note send and e-mail response).

Please advise if there is anything else needed to be done.

Thank you.

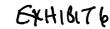
Sincerely,

Alan J. Řandzin

Treasurer, Jim Gerlach for Congress Committee









Change FEC Starting Information

FEC Starting Information

Use this form to change the values from which all FEC Form 3 reports are derived These should be the election-cycle totals from the last report you filed successfully.

If using the post-general report, use the column C totals for the NEW election-cycle.

Closing Date:	11/22/2004
11(a)(iii) Contributions from Individuals:	13339.5
11(b) Contributions from Political Parties:	0
11(c) Contributions from Other Political Committees:	4000
11(d) Contributions from the Candidate:	0
13(a) Loans Made or Guaranteed by the Candidate:	0
13(b) All Other Loans:	0
14 Offsets to Operating Expenditures:	0
15 Other Receipts:	49.87
17 Operating Expenditures:	45482.12
18 Transfers to Other Authorized Committees:	0
19(a) Loan Repayments to the Candidate:	0
19(b) All Other Loan Repayments:	0
20(a) Contribution Refunded from Individuals:	0
20(b) Contributions Refunded to Political Parties:	0
20(c) Contributions Refunded to Other Political Committees:	0
21 Other Disbursements:	0
27 Cash-on-Hand at Close:	162870.67

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EXHIBIT 7

Generate FEC Form 3

Report Options	
Report Type:	April Quarterly
Current Election:	Congress P-2006
Sort:	Date 🔀
Amendment:	E
Optional Memo:	

Report	Dates
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From Date: 1/1/2005	
To Date: 3/31/2005	
Previous General 11/2/2004 Election Date:	-
General Election Date:* 11/7/2006	•
Election Date: 11/7/2006	•

Treasurer's Electronic Signature

First: mike Last: dehaven

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^{*}General Election Date may be the same as Election Date If this reporting period includes a General election, use that date for "General Election Date."

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Page 2 of 2

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. Date:	Date: 11/18/2004	
Contributor:	Contributor: Beth W. Myers	10
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Page 2 of 2

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☐ Followups Needed Only

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GOP Committee

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Codes (A+Z)

27044154587 EXHIBIT 13

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Method: Check	Check	
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Amount: 4000	000	
Category Type: EMM	WW	
Category: 1	10233-02 Laura Bush EMC	
Election: P	P-2006 Congress	
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Name: Mr. Richard W. Ireland

Amount: 2000
Previously Unallocated: \$2,000.00

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Eve Allen Eve Allen

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Create Letter

General Information		Quick Codes	Edit Mode	1773
Name: United States Treasury-Internal	asury- Internal Revenue Service	Code Type: Gerlach Volunteers		
Description:		BV ⊕ : □		
URL:	< <u>000</u>	□:⊕ ∧do	□:⊖	
Committee: ☐ Bank: ☐ Tax ID#:	Fax ID#:	VAEC ⊕: ☐	VAEN (☐ : ☐ VAHQ (☐ : 匚	
		VAHF (1):	VALE (☐ : ☐ VALD (☐ : ☐	
Addresses (A+A)	Edit Mode 📆 🐴 Add Add less	VAPW (D): □	VAPH (1): (1) VAYS (1): (2)	
	t Map	□: ① div	WdPc (i) : □	
Line 1: 57 Haddonfield Road		Phones (A+P)	Edit Mode (37) MAGG/Rhone	979
Line 2: Suite 120	X	Use Area		a
City: Cherry Hill	State: NJ Zip: 08002-4813	Work: 🔄 856	414-6715 B D N	F 2
Codes (A+z)	Sort View 🔄 Mada ©ode	Emails (A+L)	Edit Mode 🕟 Kdd Email	20.204
Communications (∆+∪)	Sort View [5] Addi@ommunication	Affiliations	Sort View 🔁 - Add Affiliation -	सन्त
☐ Followups Needed Only	Show top: 10 Reload	Custom Fields	Edit Mode	<u>चित्र</u>
		Township:		
		Political Party:		
		Political Division:		
		Voter ID:		

Region:

_	Precinct:	
Voting	Voting District:	
Committe	Committee Code:	
Financials	¥-	- Add Transaction -
All Transactions	ions	E Details
Date	Election	Type Amount
11/2/2005	P-2006 Congress	1se (\$1
11/2/2005	P-2006 Congress	Expense (\$7,812.50) Modify
10/31/2005		Expense (\$1,200.00) Modify
9/15/2005	P-2006 Congress	Expense (\$1,200.00) Modification
8/15/2005	P-2006 Congress	Expense (\$1,200.00) Modify
8/12/2005	P-2006 Congress	Expense (\$3,452.50) Nodify
7/27/2005	P-2006 Congress	Expense (\$1,200.00) Wodif
6/20/2005	P-2006 Congress	Expense (\$1,200.00) Winding
5/21/2005	P-2006 Congress	Expense (\$1,200.00) Medify
4/22/2005	P-2006 Congress	Expense (\$1,200.00) Modify
4/22/2005	P-2006 Congress	Expense (\$3,460.00) Modify
Ballot Measures	sures	Edit Mode 🖾 MAdd Ballon
Notes		Edit Mode

12/19/2005

GHIBIT 17

27044154594

Edit Transaction

Edit Transaction

Enter = Save; A+N = Save & Next

Vendor: 4/22/2005 Vendor: United States Treasury-1 Amount: 3460 Category Type: EMM EMM Commiss Election: P-2006 Congress Election: P-2006 Congress Election: P-2006 Congress Election: Fundraising-003 Check Number: 1856 Cleared Date: 12/7/2005 12:13:41 PM Ist Qtr. commission - pail US Treasury-IRS Levy US Treasury-IRS Levy	Vendor: United States Treasury-1 Amount: 3460 Jory Type: EMM
Oppose: ☐ Subvendors: ☐	S Find & Add

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BeHIBIT 18

27044154595

Edit Transaction

Edit Transaction

Enter = Save; A+N = Save & Next

Expense			☐ Reversal
	Date:	Date: 3/18/2005	
,	Vendor:	Vendor: Eleanor Martin Cadden	
	Amount: 1200	1200	
Catego	Category Type: EMM	EMM K	
Ö	ategory:	Category: 60015-02 EMM Retainer	<u> </u>
	Election:	Election: P-2006 Congress	
Reportin	ig Code:	Reporting Code: Fundraising-003	
Reporting Des	cription:	Reporting Description: Fundraiser consultant ret	
Check P	Check Number: 1810	1810	
☑ Cleared	Date:	Date: 12/7/2005 12:13:41 PM	
		March Retainer	
Interna	Internal Memo:		•
	Support:		
	Oppose:		

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Subvendors:

View Individual



GX4181718

View Individual

	Combine with Dublicate Copy Contact	Copy Conta	Info.	Create Letter	2		
General Information	ation				Quick Codes		Edit Mode
Last:		First:		Middle:	Code Type: Gerlach Volunteers	h Volunteers	
Martin Cadden	Suffix:	IX: S	Salutation:			VAAR (I): []	VABS (D: L
, ,			Martin		<u> </u>	VAEN (): []	VAHQ (): []
Occupation:		Employer:	Ľ	Gender:	VAHF (1):	VALE ① : □	VALD (1): 🖂
consultantURL:	,	self		0	VAPW (): [] VID (): []	VAPH (i) : □ WdPc (i) : □	VAYS ⊕ : □
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Organization:)	Affiliations	Sort View - Add	- Add Affiliation -
Line 1	Line 1: PO Box 472						; ;
Line 2:	•	:			Custom Fields	•	Edit Mode
City	City: Uwchland	State:	РА	Zip: 19480-0472	Township:	and the second s	
					Political Party:	-	,
Codes (A+Z)			Sort View	Add Code	Political Division:		
Code Type	Code User		Date 7/23/2004	Memo	Voter ID:		
<u> </u>			12012001	☑	Region:		

Eve Allen Eve Allen Eve Allen Eve Allen

Outbound: E-mail Outbound: E-mail Outbound: E-mail Outbound:E-mail

Description

User

☐ Followups Needed Only

Communications (Δ+U)

View Individual

Expense (\$2,400.00) Modify Expense (\$7,500.00) | Modify Expense (\$7,500.00) Modify Expense (\$1,200.00) Modif Fundraiser consulltant Fundraisier consultant Fundraiser consultant Fundraiser consultant **Amount** Commission commission fee Commission commission fee retainer fee - Add Transaction -Most Recent Transactions w/Details 🔯 retainer Type 11/18/2004 Congress 11/18/2004 Congress Congress Congress 11/18/2004 G-2004 Congress 60011-02 60011-02 50015-02 60015-02 Precinct: Voting District: Committee Code: Election Retainer Retainer **G-2004** G-2004 P-2006 2006 EMM EMM EMM EMM Financials 3/18/2005 2/7/2005 Date 803 89 88 88 X Reload Notes Addi Communication **q** ⊕ Show top: 10 11/30/2004 7:16:50 AM 11/3/2004 12:46:09 PM 9/24/2004 11:58:36 AM 9/5/2004 12:43:49 PM Date/Time Sort View 🗷

Expense (\$7,222.15) | Modify

Fundraiser consultant

60011-02

EMM

88

Commission commission fee